



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: ENF-AT

APR 28 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Zeke Campbell
Superintendent of Water Quality and Treatment
Denver Water
1600 West 12th Avenue
Denver, CO 80204

Re: Finding of Violation (FOV)
Clean Air Act (CAA) section 112(r)(7)

Dear Mr. Campbell:

A CAA section 112(r)(7) inspection was conducted at the Foothills Water Treatment Plant on September 18, 2014. The inspection revealed compliance deficiencies in the facility's Risk Management Program (RMP). This FOV is being issued under the authority of CAA section 113(3)(b) to give Foothills Water Treatment Plant an opportunity to immediately resolve the deficiencies. To resolve this matter Foothills Water Treatment Plant must submit the documentation requested below. If these items are not corrected in the time specified, the facility may be subject to penalties for failure to comply with section 112(r)(7) of the CAA.

Three deficiencies identified during the EPA inspection are listed below. **Within 60 days of receipt of this letter**, Foothills Water Treatment Plant shall provide a statement to this office certifying that the facility is in compliance with section 112(r)(7) of the CAA and the specific deficiencies identified in items 1, 2 and 3 below have been corrected.

1. Prevention Program – Safety Information [68.48(b)]

Ensure that the process is designed in compliance with recognized and generally accepted good engineering practices.

- There is an interior door between the chlorinator room and injector room and this door is not equipped with anti-panic hardware. This interior door should be removed or equipped with anti-panic hardware to allow for easy access to the chlorinator room.
- *The Chlorine Institute Pamphlet 155, Water and Wastewater Operators Chlorine Handbook, Section 7.7 states, "All exit doors should open outward to the outdoors and should be equipped with anti-panic hardware that allows for easy opening. Internal exit doors are not recommended."*

2. **Prevention Program –Hazard Review [68.50(d)]**

A hazard review shall be conducted whenever a major change in the process occurs and all issues identified in the review shall be resolved before startup of the changed process.

- The 2013 Hazard Review was conducted prior to installation of new evaporators. All issues identified in this review were not resolved before the April 8, 2014 startup of the evaporators.

3. **Prevention Program – Operating Procedures [68.52(c)]**

Ensure that the operating procedures are updated, if necessary, whenever a major change occurs and prior to startup of the changed process.

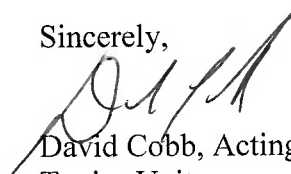
- Operating procedures were not updated prior to the April 8, 2014 startup of the new evaporators.

The statement of completion required by the above subparagraphs shall be made to:

Janis Robinson
US EPA, Region 8
1595 Wynkoop Street (8ENF-AT)
Denver, Colorado 80202
Email: robinson.janis@epa.gov

If you have questions related to this correspondence, the inspection findings or need any clarification regarding compliance issues, please contact Janis Robinson at 303-312-6149.

Sincerely,



David Cobb, Acting Unit Chief
Toxics Unit
Office of Enforcement, Compliance and
Environmental Justice